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January 5, 2012

Honorable Kiyo A. Matsumoto  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Re: United States v. Geraldo Fusella,  
11 CR 844

Your Honor,

I am writing on behalf of the defendant, Geraldo Fusella, in the above-referenced proceeding. I have informed AUSA Whitman Knapp of the following circumstances and he has no objection to Fusella's request. Mr. Fusella was to have finalized his bail package by tomorrow however due to various reasons including the hospitalization of his mother we will be unable to complete the bail package by tomorrow. Mr. Fusella was released on a \$1,000,000.00 bond signed by him and 3 co-signors and fully secured by property. As of this moment Mr. Fusella and 3 co-signors have executed the bond however we have been unable to file confessions of judgments on properties with \$1,000,000.00 of equity yet due to the vacation schedules of some of the involved individuals, his mother's illness and securing appraisals. Therefore, I respectfully request that the date for the bond to be fully secured by property be extended from tomorrow to January 18<sup>th</sup>. Mr. Fusella has also met all of his pre-trial requirements as of the time of this letter. Based on the above the defendant respectfully requests the Court grant the extension to January 18, 2012.

Respectfully yours,

  
Patrick Joyce, Esq.

cc: AUSA Whitman Knapp